

SK/MTK/AFM  
F.#2016R02228

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

No. 18-CR-633 (S-1) (EK)

ALEKSANDR ZHUKOV,  
also known as “Alexander  
Zhukov” and “ibetters,”

Defendant.

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THE GOVERNMENT’S PROPOSED VOIR DIRE

SETH D. DUCHARME  
ACTING UNITED STATES ATTORNEY  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

Saritha Komatireddy  
Michael T. Keilty  
Alexander F. Mindlin  
Assistant U.S. Attorneys  
(Of Counsel)

The government respectfully requests that in addition to the Court's regular voir dire questions—including those related to hardship, language abilities, education, employment, organizational affiliations, prior jury service, prior exposure to the criminal justice system, and familiarity with the instant case—the Court include the questions listed below.

As an initial matter, the government respectfully requests that the Court provide jurors with an outline of the safety procedures and protocols that the Court expects to establish in response to the COVID-19 pandemic, to assuage the understandable concerns that potential jurors may feel about their service.<sup>1</sup> Furthermore, the government respectfully requests that the Court formulate additional questions regarding high-risk factors set forth by the Centers for Disease Control that might expose jurors to additional risk from COVID-19. Lastly, given the uncertainty regarding the re-opening of businesses and schools in the area, the government requests additional questions regarding the availability of jurors due to, among other things, childcare and/or employment-related concerns.

Proposed Questions:

1. How often do you use computers in your day-to-day life? How often do you use the internet in your day-to-day life? What kinds of computers do you have at home? At work? Is there anyone who has never used a computer in any way whatsoever?

2. I'm going to ask you a question and give you three choices: sophisticated, working knowledge, or not familiar.

a. How would you describe your knowledge of computer applications, such as word processing, data processing, and business software applications?

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<sup>1</sup> See U.S. Courts COVID-19 Judicial Task Force, REPORT OF THE JURY SUBGROUP: CONDUCTING JURY TRIALS AND CONVENING GRAND JURIES DURING THE PANDEMIC, at 2-3 (June 4, 2020) (recommending such information be included in the first communications with prospective jurors).

How many of you would consider yourselves sophisticated? How many of you would consider yourselves knowledgeable but not particularly sophisticated? How many of you would consider yourselves basically not familiar with these matters?

b. How would you describe your level of sophistication with computer networks and the internet, such as your familiarity with IP addresses, computer servers, scripts, logs, and virtual private networks, also known as “VPNs”? How many of you would consider yourselves sophisticated? How many of you would consider yourselves knowledgeable but not particularly sophisticated? How many of you would consider yourselves basically not familiar with these matters?

c. How would you describe your level of sophistication with computer coding or developing computer programs? How many of you would consider yourselves sophisticated? How many of you would consider yourselves knowledgeable but not particularly sophisticated? How many of you would consider yourselves basically not familiar with these matters?

3. Have you, a family member, or a close friend worked in the fields of computer science, information technology, or cybersecurity, or in some other profession that extensively involves some aspect of computers? If so, where were you employed and what type of position did you hold?

4. Do you, a family member, or a close friend have any experience with hacking or being hacked? If so, what was the experience and was it a positive or negative experience?

5. Do you, a family member, or a close friend have any experience working in the fields of advertising or marketing? More specifically, do you a family member, or a close friend have any experience working in the fields of online advertising or marketing?

6. Do you hold any strong feelings related to the practice of using the internet as a platform for advertising space? If so, what are these feelings borne out of?

7. Some of the evidence in this case was obtained through the use of search warrants for individuals' email accounts, online file storage accounts, and their search and browsing histories. This evidence was obtained legally. Do you have any feelings about the use of such search warrants that would prevent you from being fair and impartial in this case?

8. The defendant was arrested in another country at the request of the United States, pursuant to a treaty between the United States and that country. Do you have any beliefs about the United States requesting the arrest of individuals abroad that would prevent you from being fair and impartial in this case?

The following persons, entities, and locations may figure prominently in the trial:

**I. Persons**

- |  |   |
|--|---|
| 1. Aleksandr Zhukov (Defendant)                          | 7. Paralegal Specialist Heather Butler            |
| 2. Andrew Frisch (Counsel for Aleksandr Zhukov)          | 8. FBI Supervisory Special Agent Evelina Aslanyan |
| 3. Abraham Rubert-Schewel (Counsel for Aleksandr Zhukov) | 9. FBI Task Force Officer Mark I. Rubins          |
| 4. Assistant United States Attorney Saritha Komatireddy  | 10. Boris Timokhin                                |
| 5. Assistant United States Attorney Michael T. Keilty    | 11. Mikhail Andreev                               |
| 6. Assistant United States Attorney Alexander F. Mindlin | 12. Denis Avdeev                                  |
|  | 13. Dimitry Novikov                               |

14. FBI Supervisory Special Agent Scott Hellman
15. FBI Special Agent Christopher Merriman
16. FBI Computer Scientist Christopher Gorsky
17. FBI Forensic Examiner Victoria Tenpenny
18. FBI Contracted Computer Scientist Lena Loewenstine
19. FBI Forensic Accountant Jonathan Gaeta
20. Czech, Bulgarian, Latvian, and Russian language interpreters

**II. Entities**

1. Media Methane
2. Mintek Group LTD
3. VertaMedia LLC
4. Crazy 4 Media
5. Affiliate Harbour
6. Plexious LLC
7. Clickandia
8. Adzos
9. Must Trade LLC
10. Integra Games LTD
11. Integra Systems LTD
12. Interactive Broker

13. HostStore
14. BMO Harris
15. ipv4Leasing
16. Bulgarian General Directorate for Countering Organized Crime
17. White Ops
18. MediaMath, Inc.
19. Webzilla Inc. / Servers.com
20. Google LLC
21. Apple Inc.
22. Microsoft Corp.
23. Oracle Corp.
24. Verizon
25. AOL
26. AT&T Communications, LLC
27. CenturyLink, Inc.
28. Charter Communications, Inc. / Time Warner Cable
29. Cox Communications Inc.
30. SpotX
31. Trade Desk Inc.
32. PepsiCo Inc.
33. The Clorox Company
34. GlaxoSmithKline plc

- 35. Norvik Banka (Bank)
- 36. Česká spořitelna (Bank)
- 37. Alfa Bank
- 38. JP Morgan Chase
- 39. Unicredit Bulbank (Bank)
- 40. Baltic Bank
- 41. Citibank
- 42. DSK Bank
- 43. Bank of America
- 44. Wells Fargo
- 45. Atlassian Corp.
- 46. Facebook, Inc.

- 47. IP2Location
- 48. AFRINIC
- 49. Centbycent.com
- 50. Geico
- 51. Purina

**III. Locations**

- 1. Varna, Bulgaria
- 2. St. Petersburg, Russia
- 3. Dallas, Texas
- 4. Wilmington, Delaware

Respectfully submitted,

SETH D. DUCHARME  
Acting United States Attorney  
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271 Cadman Plaza East  
Brooklyn, New York 11201

By:                     /s/                      
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cc: Clerk of the Court (EK)  
Andrew Frisch, Esq.